

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

IN RE: FISHER-PRICE ROCK 'N PLAY
SLEEPER MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

MDL No. 1:19-md-2903

Hon. Geoffrey W. Crawford

This Document Relates To: ALL CASES

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

MOTION ON BEHALF OF:

All Plaintiffs, by and through their attorneys.

**DATE, TIME, AND PLACE
OF MOTION:**

To be determined by this Court before the Hon. Geoffrey W. Crawford, United States District Judge, Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202.

RELIEF REQUESTED:

An Order of this Court (i) granting preliminary approval of the proposed settlement memorialized in the Parties' Settlement Agreement, together with all exhibits thereto, filed contemporaneously herewith; (ii) preliminarily certifying the proposed Class for settlement purposes only; (iii) approving the form and content of, and directing the distribution of, the proposed Class Notice; (iv) appointing Kroll Settlement Administration LLC as the Settlement Administrator; (v) appointing Demet Basar, James Eubank, and Paul Evans as Class Counsel; (vi) appointing Elizabeth Alfaro, Emily Barton, Linda Black, Luke Cuddy, Rebecca Drover, Megan Fieker, Karen Flores, Nancy Hanson, Jena Huey, Samantha Jacoby, Megan Kaden, Kerry Mandley, Cassandra Mulvey, Joshua Nadel, Melanie Nilius Nowlin, Daniel Pasternacki, Jessie Poppe, Katharine Shaffer, Emily

Simmonds, Josie Willis, and Renee Wray as Class Representatives for settlement purposes only; (vii) setting a date and procedure for a Final Approval Hearing; and (viii) setting forth procedures and deadlines for Settlement Class Members to file objections to the proposed settlement, appear at the Final Approval Hearing, and request exclusion from the proposed Settlement Class; (ix) issuing a preliminary injunction; and (x) issuing related relief as appropriate.

SUPPORTING PAPERS:

A memorandum of law, the Settlement Agreement as all as all exhibits thereto, and the Joint Declaration of Demet Basar, James Eubank, and Paul Evans, together with all prior pleadings and proceedings.

Defendants do not oppose the relief sought by this motion.

**GROUND FOR
RELIEF REQUESTED:**

Fed. R. Civ. P. 23; L. R. Civ. P. 23(d).

DATED: New York, New York
July 24, 2024

/s/ Demet Basar

**BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.**

Demet Basar

W. Daniel “Dee” Miles, III

James B. Eubank

Paul W. Evans

218 Commerce Street

Montgomery, Alabama 36104

Tel: (334) 269-2343

Fax: (334) 954-7555

Demet.Basar@BeasleyAllen.com

Dee.Miles@BeasleyAllen.com

James.Eubank@BeasleyAllen.com

Paul.Evans@BeasleyAllen.com

Plaintiffs’ Lead Counsel

CONNORS LLP

Terrence (“Terry”) Connors

Andrew M. Debbins

1000 Liberty Building

Buffalo, NY 14202

(716) 852-5533

tmc@connorsllp.com

amd@connorsllp.com

Plaintiffs’ Liaison Counsel

TO: All Parties of Record